IN THE U.S. DISTRICT COURT WESTERN DISTRICT OF MISSOURI AT KANSAS CITY

RESTAURANTS FOR SALE, LLC,)
Plaintiff,) Case No. 4:19-cv-00048-FJG
v.	
JC BUSINESS GROUP, LLC, et al.,	\
Defendants.	\

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS JC BUSINESS GROUP, LLC, SANTOSHI PROPERTIES, LLC AND SAI JITTA

COMES NOW, Douglas J. Patterson, of Property Law Firm, LLC ("Attorneys") current attorneys for Defendants JC Business Group, LLC, Santoshi Properties, LLC and Sai Jitta ("Client Defendants"), and pursuant to Local Rule 83.2 does hereby move for an order of this Court allowing the undersigned counsel to withdraw from the representation of Client Defendants based upon the following:

- 1. Client Defendants have advised the undersigned counsel that the legal services of Attorneys defending Client-Defendants are excessive and that the Attorneys should not undertake discovery and other prepatory actions in order to ready this case for disposition, either by way of dispositive motions or trial.
- 2. Client Defendants have advised the Attorneys that the Attorneys are not to undertake the activities typically undertaken by lawyers in a case before this Court in order to comply with the current scheduling and case management matters already ordered by the Court.
- 3. Client Defendants and instructed the Attorneys that they are not to communicate with opposing counsel on matters which lawyers need to discuss in order to be cordial and work together in order to properly prepare this case for disposition.

- 4. Client Defendants have instructed the Attorneys that the Attorneys shall not continue any discussion with opposing counsel which could lead to a settlement of this case.
- 5. Client Defendants have advised the Attorneys that, essentially, a substantial amount of their time involved thus far in preparing this case, such as preparing the Planning Report, was unnecessary and have objected to the Attorneys' billings in this regard.
- 6. Pursuant to Rule 4-1.16 of the Missouri Rules of Professional Conduct, the continued attorney-client relationship among Attorneys and Client Defendants will result in the following unacceptable and unworkable issues:
 - a. The client insists upon taking action that the lawyer considers repugnant or with which the lawyer has a fundamental disagreement (Mo. Rule 4-1.16 (b)(4);
 - b. The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled (Mo. Rule 4-1.16 (b)(5);
 - c. The representation will result in an unreasonable financial burden on the Attorneys or has been rendered unreasonably difficult by the client (Mo. Rule 4-1.16 (b)(6).
- 7. Client Defendants, all controlled by Sai Jitta, have been contacted regarding this motion, meetings have occurred and so far, they have expressed no objection to the Attorneys' withdrawal.

WHEREFORE, Douglas J. Patterson and Property Law Firm, LLC pray for an order of this Court authorizing Property Law Firm, LLC and Douglas J. Patterson to withdraw as counsel for Client Defendants JC Business Group, LLC, Santoshi Properties, LLC and Sai Jitta.

Further, the Attorneys request an order of the Court staying all timeframes and scheduled events pending the Court's consideration and ruling on this Motion and for such other and further orders as the Court deems fair and reasonable under the premises.

Respectfully submitted,

/s/ Douglas J. Patterson

Douglas J. Patterson, MO # 22991

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Douglas J. Patterson

STATE OF KANSAS) COUNTY OF JOHNSON)

Subscribed and sworn to before me, a notary public on this the 12th day of September

2019.

Notary Public

My Commission Expires:

NOTARY PUBLIC - State of Kansas
BENNY J. HARDING
My Appt. Expires

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a notification of filing to all counsel of record. In addition, the foregoing document delivered, vis United States mail and email to:

JC Business Group, LLC Santoshi Properties, LLC Sai Jitta 14616 Nieman Road Overland Park, KS 66221 ddinjc@live.com

/s/ Douglas J. Patterson
Douglas J. Patterson